

**STATEMENT OF DEFAULT**

Debtor(s): Richard T. McGinnis

Case No. 20 B 03230 Chapter 13

Moving Creditor: Home Point Financial

Date Case Filed: 2/5/2020

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed 9/1/2020

1. Collateral

- a. ☒ Home
- b. ☐ Car
- c. ☐ Other (describe) \_\_\_\_\_

2. Balance Owed as of Petition Date \$172,354.14

Total of all other Liens against Collateral \$0

2. In Chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition:

\_\_\_\_\_

3. Estimated Value of Collateral (*must* be supplied in *all* cases) \$108,860.00

4. Default

- a. ☐ Pre-Petition Default  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
- b. ☒ Post-Petition Default
  - i. ☐ On direct payments to the moving creditor  
Number of months 8 Amount \$7,965.50
  - ii. ☐ On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_

5. Other Allegations

- a. ☒ Lack of Adequate Protection §362(d)(1) \_\_\_\_\_
  - i. ☐ No insurance
  - ii. ☐ Taxes unpaid Amount \$ \_\_\_\_\_
  - iii. ☐ Rapidly depreciating asset \_\_\_\_\_
  - iv. ☐ Other \_\_\_\_\_
- b. ☒ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
- c. ☐ Other "Cause" § 362(d)(1)
  - i. ☐ Bad Faith (describe) \_\_\_\_\_
  - ii. ☐ Multiple filings
  - iii. ☐ Other (describe) \_\_\_\_\_
- d. Debtor's Statement of Intention regarding the Collateral
  - i. ☐ Reaffirm
  - ii. ☐ Redeem
  - iii. ☐ Surrender
  - iv. ☐ No Statement of Intentions Filed

Date: December 31, 2020

/s/ Kathryn A. Klein

Attorney for Secured Creditor